

MARTHA BOERSCH (CABN 126569)
Attorney for the United States
Acting Under Authority Conferred by 28 U.S.C. § 515

MARTHA BOERSCH (CABN 126569)
Chief, Criminal Division

NIKHIL BHAGAT (CABN 279892)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-6982
nikhil.bhagat@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NOS. 23-CR-00471 WHO
)	25-CR-00053 WHO
Plaintiff,)	
)	
v.)	STIPULATION RE PAYMENT OF CRIMINAL
)	MONETARY PENALTIES AND [PROPOSED]
NOAH ROSKIN-FRAZEE,)	ORDER
)	
Defendant.)	

STIPULATION

The United States and defendant Noah Roskin-Frazee, by and through their respective counsel, hereby stipulate and agree as follows:

1. The defendant has pleaded guilty to the counts in the Indictment in case number 23-CR-00471 and the sole count of the Information in case number 25-CR-00053.
2. Although the Court has not yet imposed judgment, the defendant has agreed to pay a sum of at least \$3,945,096.32 in restitution and to deposit at least \$1,000,000 with the Clerk of the Court within 60 days of his guilty plea.

STIPULATION AND [PROPOSED] ORDER

- 1 3. The defendant is liable for criminal monetary penalties, including special assessments under
2 Title 18, United States Code, 3013, restitution imposed pursuant to Title 18, United States
3 Code, Section 3663A, and fines imposed under Title 18, United States Code, Section 3571.
4 4. To facilitate the defendant's compliance with his contractual obligations with the United
5 States—namely, his obligation to deposit \$1,000,000 in the registry of the Court within 60
6 days of his change of plea—as well as prompt distribution of restitution to victims, the Court
7 should direct the Clerk to accept monies from the defendant.

8 WHEREFORE, for the foregoing reasons, the parties respectfully request that the Court enter an
9 order in the form proposed directing the Clerk to accept payment of any funds from the defendant and to
10 hold such funds in the Clerk's Registry, including interest earned thereon, pending further order of the
11 Court.

12 Respectfully submitted,

13 MARTHA BOERSCH
14 Attorney for the United States
15 Acting Under Authority Conferred
by 28 U.S.C. § 515

16 Dated: March 19, 2025

_____/s/
17 NIKHIL BHAGAT
Assistant United States Attorney

18
19 CONRAD METLITZKY KANE LLP

20
21 Dated: March 19, 2025

_____/s/
22 MIRANDA KANE
Counsel for Noah Roskin-Frazee

[PROPOSED] ORDER

Pursuant to the parties' stipulation, and for good cause shown,

IT IS HEREBY ORDERED that the Clerk of Court shall allow payment of Defendant's anticipated obligations for criminal monetary penalties and/or forfeiture by check or by wire transfer, and shall provide wire transfer instructions to counsel for the parties at nikhil.bhagat@usdoj.gov and mkane@conmetkane.com.

IT IS FURTHER ORDERED that the Clerk of the Court shall accept any funds delivered to him via wire transfer and/or check that are designated under the case number 3:25-CR-00053-WHO and maintain such funds in the Clerk's Registry, including interest earned thereon, pending any further order of the Court.

IT IS SO ORDERED.

DATED: _____

HON. WILLIAM H. ORRICK
Senior United States District Judge